



NOTICE OF EX PARTE

May 23, 2019

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

RE: GN Docket No. 17-108; Modernizing the Form 477, WC Docket No. 11-10; Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992, MB Docket No. 05-311; WC Docket No. 16-106; MB 18-202

Dear Ms. Dortch:

At the request of ALLvanza, Rosa Mendoza, President & CEO to ALLvanza, met on Tuesday, May 21, 2019 with Commissioner Michael O’Rielly and Arielle Roth, Wireline Legal Advisor, Office of Commissioner O’Rielly. Several issues were discussed during the meeting, including cable franchise fees, mapping and reporting of broadband availability, net neutrality, privacy and legacy regulations for cable programmers.

During the meeting, ALLvanza shared information about many of the positive things happening in the creative industries such as increases in innovation, competition and opportunity and the encouraging strides in diversity within the film and TV industries. ALLvanza also expressed concern with burdensome and unnecessary regulations that can hinder the progress of the creative industries.

ALLvanza encouraged the commission to consider removing unnecessary legacy regulations for cable programmers and other traditional programmers and explained that those regulations can also provide an unfair advantage in the marketplace when some of the emerging players, like streaming services, are not beholden to the same rules and regulations. ALLvanza emphasized that the FCC should not miss the opportunity to modernize its legacy cable regulations, particularly for children’s programming, in a way the protects children while at the same time providing cable and traditional programmers the ability to compete with newer streaming services, among others.

ALLvanza explained that a thriving US economy relies partly on a thriving creative industry and that it helps keep the U.S. at the forefront of the global economy and that it is crucial to not inhibit this growth with unnecessary legacy regulations.

ALLvanza explained the need for everyone in the US, and especially those from underserved communities, to have access to reliable broadband internet service. ALLvanza mentioned that it is essential that internet service providers are not discouraged from providing this essential service by having to cover undue, excessive and duplicative fees and taxes. ALLvanza explained that this type of unnecessary financial burden could slow the deployment of broadband services that are critical to closing the digital divide.

ALLvanza expressed that charging duplicative fees and taxes on broadband can hurt consumers and especially those from vulnerable communities, who already struggle to be connected, because the extra cost can be passed to them. ALLvanza expressed its view about the need to explore lowering the current cap on fees or, at a minimum, ensure there is not an increase in the cap to more than the 5 percent to avoid hurting consumers.

ALLvanza expressed the need for accurate broadband mapping to ensure that federal subsidies are targeted to the areas of greatest need. ALLvanza explained that the type of data this information can provide is critical to closing the digital divide; without accurate data resources might be expended in areas that do not have the greatest need, thereby depriving those who depend on these vital services to be connected.

ALLvanza mentioned the proposals that are aimed at improving this issue:

- NCTA- The Internet & Television Association's proposal
- USTelecom's proposal
- Microsoft's proposal

ALLvanza stated that the FCC should review the proposals and expressed that we believe NCTA's proposal is the most effective for improving the mapping issue and that though not perfect, presents an effective plan. Additionally, ALLvanza expressed that it believes NCTA's proposal would fix many of the issues with reporting and mapping in an efficient and timely manner.

ALLvanza stated its position with respect to advocating for a bipartisan net neutrality solution. ALLvanza discussed the fact that we encourage Congress to work together in a bipartisan way to come to a solution for the good of all Internet stakeholders living in the U.S. ALLvanza expressed that the solution should be a newly-developed, bipartisan solution and not a reliance on outdated regulatory policy such as Title II.

ALLvanza established that we advocate for pro-consumer, comprehensive, understandable, straightforward data protections, both for individuals and generally, for all stakeholders that are applied fairly and evenly to all players in the internet ecosystem. ALLvanza ensured an understanding of our belief that privacy and a clear comprehension of one's rights and protections is a critical part of ensuring comprehensive broadband integration and so therefore advocates to ensure that privacy and online safety is developed in a way that protects all adopters.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'RM' with a stylized flourish.

Rosa Mendoza, President & CEO, ALLvanza